

GARY M. RESTAINO
United States Attorney
District of Arizona
CARIN C. DURYEE
Assistant U.S. Attorneys
United States Courthouse
405 W. Congress Street, Suite 4800
Tucson, Arizona 85701
Telephone: 520-620-7300
Carin.duryee@usdoj.gov
Scott.Turk@usdoj.gov
Attorneys for Plaintiff

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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR22-00973 TUC-RM(LCK)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Timothy Mikell Schultheis,
aka Jackson Oden,

Defendant.

INDICTMENT

Violations:

18 U.S.C. § 2423(a)
(Transportation of a Minor with Intent to
Engage in Criminal Sexual Activity)
Count 1

18 U.S.C. § 2423(b)
(Travel with Intent to Engage in Illicit
Sexual Activity)
Count 2

VICTIM CASE

THE GRAND JURY CHARGES:

COUNT ONE

**TRANSPORTATION OF A MINOR WITH INTENT
TO ENGAGE IN CRIMINAL SEXUAL ACTIVITY**

On or about March 20, 2022, in the District of Arizona, the defendant, TIMOTHY MIKELL SCHULTHEIS, aka JACKSON ODEN, did knowingly transport an individual who had not attained the age of 18 years in interstate commerce for the purpose of engaging

1 in sexual activity for which any person can be charged with a criminal offense, to wit:
2 TIMOTHY MIKELL SCHULTHEIS did knowingly transport Jane Doe, a 12 year-old
3 minor, from the state of Arizona to the state of South Carolina, with intent to engage in
4 sexual activity that would constitute a criminal offense under Title 18, United States Code,
5 Sections 2241(c) and 2246 if the sexual contact occurred in the special maritime and
6 territorial jurisdiction of the United States.

7 All in violation of Title 18, United States Code, Section 2423(a).

8
9 **COUNT TWO**
10 **TRAVEL WITH INTENT TO ENGAGE IN ILLICIT SEXUAL ACTIVITY**

11 On or about March 20, 2022, in the District of Arizona, TIMOTHY MIKELL
12 SCHULTHEIS, aka JACKSON ODEN, did travel in interstate commerce from the state of
13 Arizona to the state of South Carolina for the purpose of engaging in illicit sexual conduct,
14 as defined in Title 18, United States Code, Section 2423(f), to wit: sexual contact (as
15 defined in Section 2246) with a person under eighteen years of age that would be a violation
16 of Chapter 109A of Title 18, United States Code, if the sexual contact occurred in the
17 special maritime and territorial jurisdiction of the United States.

18 All in violation of Title 18, United States Code, Section 2423(b).

19 A TRUE BILL

20 / s /

21
22 **FOREPERSON OF THE GRAND JURY**
23 **Dated: May 4, 2022**

24 GARY M. RESTAINO
25 United States Attorney
26 District of Arizona

**REDACTED FOR
PUBLIC DISCLOSURE**

27 / s /

28 **CARIN C. DURYEE**
Assistant U.S. Attorney